

COOLEY LLP  
BOBBY GHAJAR (198719)  
(bghajar@cooley.com)  
TERESA MICHAUD (296329)  
(tmichaud@cooley.com)  
COLETTE GHAZARIAN (322235)  
(cghazarian@cooley.com)  
1333 2nd Street, Suite 400  
Santa Monica, California 90401  
Telephone: (310) 883-6400  
MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
JUDD LAUTER (290945)  
(jlauter@cooley.com)  
ELIZABETH L. STAMESHKIN (260865)  
(lstameshkin@cooley.com)  
3175 Hanover Street  
Palo Alto, CA 94304-1130  
Telephone: (650) 843-5000  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
(adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304  
Telephone: (650) 815-4131

*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
Individual and Representative Plaintiffs,  
v.  
META PLATFORMS, INC., a Delaware  
corporation;  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF SY CHOUDHURY IN  
SUPPORT OF META'S OPPOSITION TO  
PLAINTIFFS' LETTER BRIEF REGARDING  
THE DEPOSITION OF SY CHOUDHURY**

1 I, Sy Choudhury, hereby declare:

2 1. I am Director of Business Development, AI Partnerships at Meta Platforms, Inc.  
3 (“Meta”)

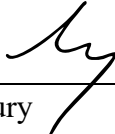
4 2. The contents of this declaration are based on my personal knowledge and if called  
5 as a witness, would testify to the matters contained herein.

6 3. During my 30(b)(1) deposition on December 5, 2024, I was asked about a meeting  
7 regarding [REDACTED] Counsel for Plaintiffs asked me the name  
8 of the in-house counsel involved in that meeting. In response, I answered “Natascha” and stated  
9 that I could not remember her last name.

10 4. Upon reflection after the deposition, I recalled that the in-house attorney who  
11 participated in the meeting was Mo Metanat, an in-house counsel at Meta who provides legal advice  
12 regarding AI matters.

13  
14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct.

16 Executed in Lafayette, California on this 11<sup>th</sup> day of December, 2024.

17  
18  
19   
Sy Choudhury